

REMARKS

Applicant respectfully requests reconsideration and allowance of the subject application. Claims 1-5 and 7-21 are pending in this application.

35 U.S.C. § 103

Claims 1-5 and 7-21 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,044,471 to Colvin (hereinafter "Colvin") in view of U.S. Patent No. 6,606,744 to Mikurak (hereinafter "Mikurak"). Applicant respectfully submits that claims 1-5 and 7-21 are not obvious over Colvin in view of Mikurak.

Colvin is directed to a method and apparatus for securing software to reduce unauthorized use (see, title). As discussed in Colvin, each copy or group of copies of software is associated with a password (see, col. 3, lines 59-63). During the initial use or installation of the software on a computer, the end user must contact a password administrator to obtain the appropriate authorization code or password (see, col. 4, lines 33-39). The password administrator obtains registration information from the end user and provides an appropriate password or authorization code to the software (see, col. 4, lines 39-42). The password administrator stores the registration information to be used for various purposes to reduce unauthorized use of software (see, col. 4, line 66 to col. 5, line 2). The password or authorization code is communicated to the software to make the software operational on the end user's computer (see, col. 6, lines 38-40).

Mikurak is directed to collaborative installation management in a network-based supply chain environment (see, col. 1, lines 9-10). As discussed in the

Abstract of Mikurak, telephone calls, data and other multimedia information are routed through a network system which includes transfer of information across the internet utilizing telephony routing information and internet protocol address information. The system includes integrated Internet Protocol (IP) telephony services allowing a user of a web application to communicate in an audio fashion in-band without having to pick up another telephone. Users can click a button and go to a call center through the network using IP telephony. The system invokes an IP telephony session simultaneously with the data session, and uses an active directory lookup whenever a user uses the system. Users include service providers and manufacturers utilizing the network-based supply chain environment.

In the May 16, 2005 Office Action at p. 3, it was asserted that, with respect to claims 1, 10, and 19:

It is disclosed by Mikurak of a registration authority that acts as a protocol gateway that is coupled to receive messages from a certificate authority (col. 67, lines 15-19, 21-25, col. 269, lines 58-65, and as shown in Figure 120).

Applicant respectfully disagrees with this characterization of Mikurak. Mikurak, at col. 67, lines 15-25 recites:

In terms of architecture, two given networks are connected by a computer that attaches to both of them. Internet gateways and routers provide those links necessary to send packets between networks and thus make connections possible. Without these links, data communication through the Internet would not be possible, as the information either would not reach its destination or would be incomprehensible upon arrival. A gateway may be thought of as an entrance to a communications network that performs code and protocol conversion between two otherwise incompatible networks. For instance, gateways transfer electronic mail and data files between networks over the internet.

Mikurak at col. 269, lines 58-65 recites:

The central corporate headquarters will maintain a CA (Certificate Authority) to administer the certificates. The CA is integrated with an LDAP server to store directory information. An RA (Registration Authority) is used to process certificate requests. For users at customer locations, the authentication occurs at the corporate web server and is managed by the web server access control software.

As can be seen from the cited portions of Mikurak, although Mikurak discusses Internet gateways and also discusses a Certificate Authority and a Registration Authority, there is no mention or discussion of a registration authority operating as a protocol gateway between a device and a certificate authority. The Internet gateways of Mikurak provide links necessary to send packets between networks – there is no discussion or mention that these Internet gateways do anything more. Applicant respectfully submits that the mere existence of an Internet gateway as described in Mikurak does not provide any disclosure or suggestion for a registration authority to operate as a protocol gateway as recited in claims 1, 10, and 19. The Internet gateway and Registration Authority of Mikurak are described as separate devices – there is no mention or discussion in Mikurak of including the functionality of the Internet gateway in the Registration Authority of Mikurak.

With respect to Colvin, Colvin is not cited as curing and does not cure these deficiencies of Mikurak.

For at least these reasons, Applicant respectfully submits that claims 1, 10, and 19 are allowable over Colvin in view of Mikurak.

Given that claims 2-5 and 7-9 depend from claim 1, claims 11-18 depend from claim 10, and claim 20 depends from claim 19, Applicant respectfully

submits that claims 2-5, 7-9, 11-18, and 20 are likewise allowable over Colvin in view of Mikurak for at least the reasons discussed above.

With respect to claim 21, claim 21 depends from claim 1 and Applicant respectfully submits that claim 21 is allowable over Colvin in view of Mikurak due to its dependency from claim 1. Furthermore, claim 21 recites:

A method as recited in claim 1, further comprising:
receiving the password as part of a subsequent request from
the device; and
comparing the received password to the password in the
password table to verify that the subsequent request actually came
from the device.

Applicant respectfully submits that no such receiving and comparing is disclosed or suggested by Colvin in view of Mikurak.

Colvin, as discussed above, discusses a password administrator that obtains registration information from an end user and provides an appropriate password to make software operational on the end user's computer. However, nowhere in Colvin is there any discussion or mention of receiving a password as part of a subsequent request from a device (the device from which the request for the password was received), and comparing the received password to the password in the password table to verify that the subsequent request actually came from the device as recited in claim 21. Colvin discusses providing an appropriate password to make software operational on an end user's computer, not comparing the received password to the password in the password table to verify that the subsequent request actually came from the device as recited in claim 21.

Mikurak, as discussed above, discusses a collaborative installation management in a network-based supply chain environment. However, nowhere in

Mikurak is there any discussion or mention of receiving a password as part of a subsequent request from a device (the device from which the request for the password was received), much less of comparing the received password to the password in the password table to verify that the subsequent request actually came from the device as recited in claim 21.

As there is no disclosure or suggestion of the receiving and comparing of claim 21 in Colvin or Mikurak, Applicant respectfully submits that the combination of Colvin and Mikurak does not disclose or suggest the receiving and comparing of claim 21.

Applicant notes that although claim 21 is rejected over Colvin in view of Mikurak in the May 16, 2005 Office Action, there is no indication in the May 16, 2005 Office Action of where the elements of claim 21 are allegedly taught by Colvin and Mikurak. If this rejection of claim 21 is maintained, Applicant respectfully requests that particular portions of Colvin and Mikurak where the elements of claim 21 are asserted as being disclosed be identified.

Accordingly, for at least these reasons, Applicant respectfully submits that claim 21 is allowable over Colvin and Mikurak.

Applicant respectfully requests that the §103 rejections be withdrawn.

Conclusion

Claims 1-5 and 7-21 are in condition for allowance. Applicant respectfully requests reconsideration and issuance of the subject application. Should any matter in this case remain unresolved, the undersigned attorney respectfully

requests a telephone conference with the Examiner to resolve any such outstanding matter.

Respectfully Submitted,

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By: ATS

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